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February 17, 2022

VIA ECF

Honorable Edward S. Kiel, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Square, Courtroom PO 08
Newark, NJ 07101

Re: Vanderhoef v. China Auto Logistics, Inc., No. 2:18-cv-10174-CCC-ESK (D.N.J.)

Dear Judge Kiel:

We represent Lead Plaintiffs in the above-referenced action. After conferring with counsel for Defendant Howard Barth we submit this joint letter on behalf of Lead Plaintiffs and Mr. Barth, requesting that the Court enter the attached Discovery Confidentiality Order. The attached order is substantively identical to the form order provided as Appendix S to the Local Rules for the District of New Jersey. The other Defendants have not retained new counsel and our attempts to contact them have been unsuccessful.

Respectfully submitted,

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cc: All parties via ECF

Encl.